



April 8, 2003

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Dear Ms. Dortch:

Montana Wireless, Inc. ("MWI") hereby submits its quarterly report on the implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

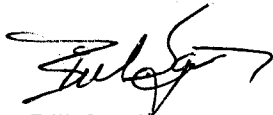
MWI is committed to complying with Commission requirements regarding TTY. However in order to comply with this government mandate, MWI must upgrade its system. As the Commission is aware from MWI's previous filings in this docket, due to Nortel's discontinuation of its support of MWI's current dual-load wireless and wireline traffic switch, MWI must purchase a second switch and split the traffic from the existing switch. Before MWI can split the traffic, it must upgrade the system software to LWW007 (the equivalent of wireless MTX 9). Once the switch split is achieved, MWI must upgrade the system software a second time to wireless load MTX 10. Because of Nortel's decision to no longer support its dual mode switch, MWI has been put in the unusual circumstance of having to perform a technically complex switch split seamlessly.

Before MWI can proceed with the complex implementation task ahead of it, however, it must obtain the necessary software and hardware from its longtime vendor, Nortel. Once the new switch is installed, MWI must install a second software upgrade that will permit it to split the traffic from the single switch, and accomplish that split. MWI understands that it will take about ten weeks to complete each software upgrade and approximately four months for the switch split. When the second upgrade is complete, MWI will be in a position to test and deploy the new technology.

Late last year Nortel provided MWI with initial quotes. The quotes provided at that time did not take into consideration the number of customers to be moved to the new switch. MWI requested that Nortel provide a new quote which requires transitioning of fewer customers from the existing switch to the new switch once the switch split is complete. Nortel has taken this request and is having the design re-engineered. MWI expects that Nortel will provide the new quote soon. Once the quote is received MWI will actively negotiate an agreement with Nortel. Once the agreement is in place MWI will have a firm implementation schedule from Nortel. Although an implementation schedule is not available, Blackfoot tentatively expects a 4<sup>th</sup> quarter 2003 install of the required hardware and software.

MWI remains committed to complying with Commission requirements regarding TTY.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bill Squires", with a stylized flourish at the end.

Bill Squires  
Senior Vice President – General Counsel  
Montana Wireless, Inc.

Montana Wireless, Inc.  
E911 TTY Device Capability Report as of April 8, 2002

**Development Activities**

1. **Network Infrastructure Software Development** – We have continued discussions with our network vendor, Nortel. They indicate that TTY compatible software will be in the MTX 10 software load. This software load cannot be installed until the current switch is split and a new switch installed.
2. **Handset Development and Testing Plans** – We currently offer our customers Motorola v60i and Kyocera 2325 TTY capable handsets. At this time we are evaluating several new models from Kyocera, Motorola, and Nokia.
  - Kyocera 3245
  - Motorola T720
  - Nokia 3585i

These models are reportedly TTY compatible and we would expect to offer them for sale as well. They should be available to sell in May pending a positive evaluation. The new handsets would replace current equipment that may not be TTY and/or E-911 capable. However, the TTY/E-911 feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
3. **Beta Testing and Lab Testing** – We are a small rural carrier, and are looking to our equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, we will test the equipment we procure as soon as it is available, to make sure it meets the manufacturer's specifications.
4. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
6. **Efforts Toward Achieving Digital Wireless Solution compatibility with enhanced TTY** – We must upgrade our switch, split the switch and load additional software. We are in the process of negotiating an agreement with Nortel for the necessary hardware and software. Once an agreement is reached, we anticipate a firm implementation schedule with a tentative completion in 3<sup>rd</sup> quarter 2003.

## **Testing and Deployment Activities**

7. **Carrier Coordination of Testing with PSAP** – We will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
9. **Retail Availability of Necessary Consumer Equipment** – As indicated above we are currently offering four different models. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.